

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION**

JANE DOES 1-9,

Plaintiffs,

Case No.: 7:20-CV-00947-DCC

vs.

COLLINS MURPHY et. al.,

Defendants.

JANE DOE,

Plaintiff,

Case No.: 7:21-CV-03193-DCC

vs.

LIMESTONE UNIVERSITY et. al.,

Defendants.

**PLAINTIFFS' REPLY TO DEFENDANTS' MG FREESITES, LTD. and MINDGEEK
S.A.R.L RESPONSE IN OPPOSITION DKT. ENTRY 404**

Plaintiffs, by and through their undersigned counsel, hereby submit this Reply to Defendants MG Freesites, LTD. and MindGeek SARL's Response in Opposition to Plaintiffs Motion for Extension of Time to conduct discovery, Dkt. Entry 392.

As a preliminary matter, Plaintiffs do not oppose the idea of an extension of all remaining deadlines of the Scheduling Order. The Plaintiffs primary concerns when making their request for an extension of the discovery deadline was to continue the case at an efficient pace and to not delay trial, if possible. Plaintiffs' requests for an extension of ninety (90) days take into consideration the hurdles already experienced in the discovery thus far, as explained in Plaintiffs' Memorandum in Support, Dkt. Entry 392-1. These hurdles, coupled with Defendants efforts to delay the production of relevant documents, have resulted in a slow-moving discovery pace. If the Court deems that an extension of all remaining deadlines is appropriate, Plaintiffs have no objection.

Plaintiffs' only intent is to investigate the topics of concern this Court emphasized in the various discovery conferences held with the parties. Plaintiffs do not intend to flood the MindGeek Defendants with newly propounded discovery that is broad and not tailored to illicit specific information. This Court can recognize that Plaintiffs, after their review of the supplemental production recently produced by the MindGeek Defendants, may need to follow-up with additional targeted discovery or seek further witness/custodian testimony. Defendants argue that the parties should be barred from serving new deposition notices, however, to date, the MindGeek Defendants have failed to produce a 30(b)(6) witness to provide testimony regarding topics 12 and 19 as they pertain to the algorithm/technology utilized by Pornhub.com, which is a crucial piece of this case and have refused to allow Plaintiffs to take the depositions of other important witnesses. Plaintiffs have no ulterior interest at all. All the Plaintiffs are seeking is to

understand what aspects of the website are handled via the MindGeek Defendants technology/algorithm and how/why. While the MindGeek Defendants make complaints about Plaintiffs discovery efforts, their arguments directly contradict the intent behind Fed. R. Civ. Pro. 26, 30, 33, 34. It is only logical that as Plaintiffs learn information through discovery that they would be prompted to adjust their efforts accordingly.

Plaintiffs recognize the MindGeek Defendants request for an extension includes a request to extend all remaining deadlines and believe that the requested extension of ninety (90) days is appropriate to give all parties fair opportunity to complete discovery. The MindGeek Defendants request for a sixty (60) day extension also ignores the outstanding discovery disputes the Plaintiffs have with the Hammy Media Defendants which will also require time to resolve. That said, if this Court determines that the appropriate extension of time would be sixty (60) days, Plaintiffs have no objection but would ask that in its Order, the Court places measures that ensure that all Defendants comply with their obligations in discovery, to avoid any additional undue delay.

Because Plaintiffs have shown that good cause exists to extend the discovery deadline, this Court should grant their Motion for Extension of Time of the Discovery deadlines.

BELL LEGAL GROUP, LLC

/s/ J. Edward Bell, III

J. Edward Bell, III (#1280)

Joshua M. W. Salley (#13214)

Gabrielle A. Sulpizio (#12715)

219 North Ridge Street

Georgetown, SC 29440

Telephone: (843) 546-2408

jeb@edbelllaw.com

jsalley@edbelllaw.com

Counsel for Plaintiffs

**DOLT, THOMPSON, SHEPHERD &
CONWAY, PSC**

Tyler S. Thompson (admitted *Pro Hac Vice*)

Liz J. Shepherd (admitted *Pro Hac Vice*)

Chad Propst (Admitted *Pro Hac Vice*)

13800 Lake Point Circle

Louisville, KY 40223

Telephone: (502) 244-7772

tthompson@kytrial.com

lshepherd@kytrial.com

jstanton@kytrial.com

Counsel for Plaintiffs

**NATIONAL CENTER ON SEXUAL
EXPLOITATION**

Benjamin Bull (admitted Pro Hac Vic)

Danielle Bianculli Pinter (admitted Pro Hac Vice)

Christen Price (admitted Pro Hac Vice)

Peter Gentala (admitted Pro Hac Vice)

1201 F Street NW

Washington, D.C. 20004

bbull@ncose.com

dpinter@ncoselaw.org

cprice@ncoselaw.org

pgentala@ncoselaw.org

Counsel for Plaintiffs

June 7, 2023
Georgetown, SC